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December 14, 2005



**Via Overnight Delivery**

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site  
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

This letter is in response to the United States Environmental Protection Agency's ("the Agency") Information Request pertaining to the above-captioned Site, which was received by Bridgestone Americas Holding, Inc. on November 17, 2005. The response is submitted on behalf of Bridgestone Firestone North American Tire, LLC as successor to The Firestone Tire & Rubber Company, which owned Firestone Synthetic Rubber and Latex Company at the time of the alleged transactions which are the subject of this request.

**Preliminary Statement**

At the outset, the Company denies any implication that a waste disposal connection exists between the Company and the Site which would trigger any potential liability on the part of the Company under the Comprehensive Environmental Response Compensation Liability Act (CERCLA).

While the Company has carried out a search for the information requested, it should be noted that it objects generally to the Information Request because it is overly broad and insufficiently limited in scope as to time and geographic location. It imposes an undue burden on the Company and, in the absence of any established connection between the Company and the Site, becomes arbitrary and an abuse of discretion.

The Company specifically objects to what it believes is a vague and inaccurate reference to 18 U.S.C. §1001 and the possible penalties thereunder. Any information provided by the Company is based upon a reasonable investigation and search of records kept in the ordinary course of business and the Company's responses are based upon that reasonable investigation. 18 U.S.C. §1001 applies only to knowing and willful falsifications or concealments and is not applicable to all circumstances wherein the Agency claims that information supplied is false or fictitious.

The Company further objects to the request for the reason that it is beyond the scope of the Agency's authority pursuant to CERCLA §104(e), 42 U.S.C. §9604(e).

In addition, the Company objects to the request to the extent that it purports to impose a continuing obligation upon the Company to submit responsive information which may be discovered at a later time. The Company is unaware of any requirement under CERCLA or otherwise which imposes such an obligation. If the Agency has other information which it believes may establish a connection between the Company and the Site, the Company requests that such information be supplied. Absent being apprised of such other information, the Company shall assume that the written response fully satisfies the Agency's request for information.

Finally, the Company objects to the Agency's request that the response be signed by "an appropriately authorized corporate official". The Company is unaware of any requirement under CERCLA or otherwise that imposes such a duty. The matters that are the subject of this request, and the Company's response, are not within the personal knowledge of the undersigned nor is there any officer of the Company or other individual who has personal knowledge of all such matters. This letter constitutes the corporate response of Bridgestone Americas Holding, Inc. to the information request and is based upon information obtained by and from employees and counsel for the Company. The undersigned is authorized to and has signed the response as counsel for the Company.

Subject to and without waiver of the foregoing objections and general comments, the Company has made a reasonable and diligent search and inquiry for the requested information and responds as follows.

### **INFORMATION REQUESTED**

1. Describe in detail the business relationship between Bridgestone and Safety Light.

**ANSWER:** Following a diligent search and inquiry, the Company has not discovered any document or information from its own files to date which refers or relates to Safety Light or the Site. Therefore, without admitting that any business relationship ever existed between the Company and Safety Light, the Company states that it is unable to further respond to this request.

2. Did Bridgestone ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?

**ANSWER:** Following a diligent search and inquiry, the Company has not discovered any document or information from its own files to date which refers or relates to the listed entities or to the Site or which demonstrate or suggest that a waste disposal connection exists between the Company and the Site. Therefore, without admitting that the Company ever transported and/or

brokered hazardous substances and/or radioactive waste or other wastes to the Site, the Company states that it is unable to further respond to this request.

3. If you answered "yes" to Question 2, please answer the following questions:

- a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.
- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.
- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:
  - i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);
  - ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;
  - iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;
  - iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
  - v. all personnel and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;
  - vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

ANSWER: Not applicable. See response to Request No. 2.

4. Did Bridgestone ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolate at the Site?

ANSWER: Following a diligent search and inquiry, the Company has not discovered any document or information from its own files to date which refers or relates to the listed entities or to the Site or which demonstrate or suggest that a waste disposal connection exists between the Company and the Site. Therefore, without admitting that the Company ever generated radioactive wastes or other wastes that were disposed of or reclaimed at the Site, the Company states that it is unable to further respond to this request.

5. If you answered "yes" to Question 4, please address the following issues:

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:
  - i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
  - ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;
  - iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
  - iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
  - v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

- i. disposed of or treated radioactive or hazardous materials at the Site;
  - ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and
  - iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:
  - i. the persons with whom you, or other such persons, made such arrangements;
  - ii. every date on which such arrangements took place;
  - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the precise locations at which each material was disposed or treated at the Site;
  - v. the persons who selected the Site as the place at which materials were disposed or treated;
  - vi. the final disposition of each material involved in such transactions; and
  - vii. the names of employees, officers, owners, and agents for each transporter.
- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site; identify:
  - i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and
  - ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.

- e. Provide the names, titles, and areas of responsibility of any persons, including all Bridgestone employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.
- f. Describe any permits or applications and any correspondence between Bridgestone and any regulatory agencies regarding materials transported to or disposed of at the Site.
- g. Provide copies of any correspondence between Bridgestone and any third party regarding materials transported or disposed of at the Site.
- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
- j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.
- k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

ANSWER: Not applicable. See response to Request No. 4.

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

ANSWER: Following a diligent search and inquiry, the Company currently is unable to identify any such persons.

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

ANSWER: Not applicable.

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

ANSWER: Following a diligent search and inquiry, the Company currently is unaware of any information responsive to this Request.

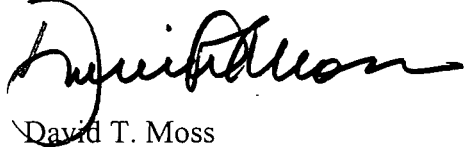
9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:
- a. Your document retention policy;
  - b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
  - c. A description of the type of information that would have been contained in the documents; and
  - d. The name, job title, and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

ANSWER: Not applicable.

We trust the foregoing constitutes a sufficient response to the Agency's Information Request. Please direct any future inquiries or correspondence regarding this response to the undersigned. Any other communications regarding this Site should be directed to Heidi Hughes Bumpers, Esq. at Jones, Day, Reavis & Pogue, 51 Louisiana Avenue, N.W., Washington, D.C., 20001-2113; telephone: 202-879-7616; facsimile: 202-626-1700; email: [hhbumpers@jonesday.com](mailto:hhbumpers@jonesday.com).

Very truly yours,

HANNA, CAMPBELL & POWELL, LLP



David T. Moss

DTM/lmp  
<<HCP 281017v1>>



FROM

64580488

HANNA CAMPBELL POWELL  
STE 300  
3237 EMBASSY PKWY

FAIRLAWN

OH 44333

330-220-7200

TO

U.S. Environmental Protection Agency, Region 3

1650 Arch St.

Philadelphia PA 19103

Harry Steinmetz-3HS62

001 (03/04) S-11  
PACKAGE LABEL



Payment

Bill to:

Receiver 3rd Party

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☐ Paid in Advance

Billing Reference (will appear on invoice)

Origin Waybill Number

CAR

38851367542



1 800 Call-DHL

AMT 52

# of Pkgs Weight (LBS)

Packaging One box must be checked

Express Envelope

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Express Pick

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Other Packaging

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Special Instructions

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